

CONTINUATION OF CRIMINAL COMPLAINT

Background

1. I, Trisha M.A. Kovac, am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) currently assigned to the Detroit Division, St. Joseph Resident Agency, FBI Violent Crimes Task Force. I have been an FBI Special Agent for over 8 years, and during that time have investigated numerous violations of federal law including child exploitation and enticement.
2. This continuation is in support of a criminal complaint and is based upon information I discovered in the course of my investigation, information from other law enforcement officers, and witness interviews. Not all of the information acquired in this investigation is contained within this continuation.

Initial Investigation and Search

3. On or about April 27, 2017, I was notified by members of the FBI Cincinnati Child Exploitation Task Force, SA David Knight and FBI Task Force Officer (TFO) Brett Peachey, that they had encountered a subject believed to reside in Watervliet, MI, and possibly producing child pornography in Osceola, IN, at the residence of subject's girlfriend. TFO Peachey has been communicating online in an undercover capacity with subject since late February 2017. The subject has distributed multiple images of child pornography, and claims to have produced some of the images himself and in the presence of his girlfriend. The subject, Joseph Mark WILLIAMS, claims to engage in sexual activity with the children to whom he has access, and has forwarded images to TFO Peachey which WILLIAMS claims are his activities with the children.
4. On February 22, 2017, TFO Peachey received a message on Motherless.com from a subject utilizing the screen name "FREESICK." The subject stated that "they" were a "Satanic Christian" couple and were into "older/younger (very younger) and incest." TFO Peachey responded and suggested that they communicate on the KiK messenger app. FREESICK responded that they prefer to use Wickr for their private messaging.
5. FREESICK sent TFO Peachey another message on Motherless.com on February 24, 2017 again stating that they were a "Satanic Taboo Couple" that were into "extremely young." FREESICK again advised that he preferred to communicate on Wickr and provided a username of "STONE666" for the Wickr app for TFO Peachey to contact him.

6. On or about February 24, 2017, TFO Peachey received a message on the KiK messenger app from a subject utilizing the screen name "SHINNINGSTAR" who stated "Hi we are FREESICK, the taboo Satanic cpl from motherless." SHINNINGSTAR advised that they were from the Fort Wayne, IN, area. He also advised that he and his girlfriend were 47 and 37 years of age. During the conversations, SHINNINGSTAR advised that their favorite fetish was young and that they routinely babysit a three year-old and one year-old child.
7. TFO Peachey and SHINNINGSTAR continued to discuss communicating on Wickr for safety reasons and SHINNINGSTAR advised that he was concerned about using KiK to send photos that aren't "mainstream."
8. On or about March 7, 2017, SHINNINGSTAR distributed a photo to TFO Peachey through KiK depicting a close up of a female's vagina and anus. Although the rest of the body cannot be observed, the photo appears to be that of a prepubescent female. Through subsequent conversations, SHINNINGSTAR indicated that he would like to engage in sexual activity with TFO Peachey's fictitious five year-old daughter. It was at this time that TFO Peachey was able to create a Wickr account and advised SHINNINGSTAR that they could now communicate using that application.
9. On or about March 9, 2017, TFO Peachey messaged SHINNINGSTAR on the Wickr application where the subject was utilizing the user name "STONE666." As they communicated on Wickr, STONE666 advised that he and his girlfriend are sexually involved with several children, writing, for example, "Lovely...we got to enjoy a nine year old and a four-year-old boy since we've been together...currently we enjoy a toddler.." STONE666 would also occasionally send nude photos of children to TFO Peachey. Some of these images were just of the children and others had adults in them as well.
10. Over subsequent conversations, STONE666 sent additional photos of child pornography to TFO Peachey and stated that they depicted children to whom he has had access in the past. Two images depicted close-ups of a young female's buttocks and vagina.
11. Administrative subpoenas were served on Motherless.com and KiK requesting any subscriber information. IP addresses were obtained that resolved to an account in the name of Joseph WILLIAMS at the Watervliet address and an account in the name of Sherri SMITH at the Osceola, IN address, with a billing address in Elkhart, IN.

12. An open source internet search for Sherri SMITH in Elkhart, IN resulted in the discovery of a Facebook account. Photos of Sherri SMITH depicted her as a black female. Photos of SMITH in the company of a white male were also observed on the page. Reviewing the FREESICK profile page on Motherless.com revealed 41 images that had been uploaded by the user.
13. The images on Motherless.com primarily depicted nude images of a black female. In some of these images, the female is engaged in sexual activity with a white male or a white male's feet and hands are seen in the photos. Various signs are also in some of the photos referring to satanic couple and motherless.com. The body type of the female in the photos appears physically similar to Sherri SMITH in the above-referenced Facebook account.
14. In addition, a post made to Sherri SMITH's Facebook account on or about March 22, 2013 is a close-up photo of a tattoo on a female's lower leg. In one of the photos uploaded to the Motherless.com account, a similar tattoo is observed on the female's lower leg.
15. In three of the photos uploaded to the Motherless.com account, the female is performing oral sex on the male. Although her entire face is not visible, she has a stud pierced in her left nostril. In several of the photos of Sherri SMITH uploaded to the Facebook account, she has the same stud piercing in her left nostril.
16. Other photos on the Facebook account depict multiple photos of a light-skinned, prepubescent female that appears to be SMITH's daughter and is indicated through Facebook Timeline posts to be approximately 10 years of age. A visual comparison of this female with the photos sent to TFO Peachey by STONE666 through the Wickr application depicting a prepubescent female sitting on the male's lap and the female in her underwear in the bathroom appear to be similar. There are also images of a bi-racial, toddler-aged female on SMITH's Facebook page, who is likely SMITH's granddaughter. The daughter of SMITH will herein be referred to as **Victim 1**, or "**V1**," and the toddler will be referred to as **Victim 2**, or "**V2**."
17. On or about April 11, 2017, STONE666 sent an additional two photos of a prepubescent female. One of the photos depicted the female nude, standing in a bathroom, with what appears to be a towel covering her face. The female is believed to be **V1**. Another depicted a close-up photo of a prepubescent female's chest. STONE666's message when sending these photos was "Our 9yo." When TFO Peachey responded "she's cute," STONE666 responded "She

really is...Half-breed with an amazing body and unbelievable ass. She's the girl we watch on the weekends...she's a mixed. We got do a little anal play a few weeks ago. Have some really nice ones of her...We also like to play with her while she sleeps and take lots of secret pix when she showers and plays."

18. On or about May 11, 2017, STONE666 sent the following images:
 - a. A close-up photo of a prepubescent female's vagina and anus being spread.
 - b. A close-up photo of a prepubescent female's vagina and buttocks from behind.
 - c. A close-up photo of a prepubescent female's vagina. The child is standing.
 - d. A close-up photo that appears to depict a prepubescent female being digitally penetrated.
 - e. A close-up photo of a nude prepubescent female's vagina being spread by a hand. The hand appears darker than the child's skin and has dark fingernail polish.
 - f. A photo of a child's two hands masturbating an adult male.
 - g. STONE666 then wrote, "Happy ending," and sent a photo of two small hands masturbating an adult male. A substance, likely semen, is on the penis and child's hands.
 - h. A photo of a nude prepubescent child standing from behind, believed to be **V2**. The child is leaning over a brown object. After reviewing the photo, it is possibly be the hips and buttocks of a black female who is on all fours. Sherri SMITH was photographed multiple times in a similar pose in the photos uploaded to the Motherless profile. A dark cloth is seen on the floor, which is also similar to one seen in the Motherless photos.
 - i. A close-up photo of a prepubescent female's vagina being spread by a white subject's fingers.
 - j. A close-up photo of a prepubescent female's vagina being spread by a black subject's fingers. The black subject is wearing dark fingernail polish. The female is believed to be **V2**.
 - k. A close-up photo of an adult male ejaculating on the legs of a prepubescent female.
19. TFO Peachey responded, "Good lord! Looked like your girlfriends fingers in the one photo. Was she playing too?" STONE666 wrote, "Of course...we like playing together...but she's likes to watch a lot too."

Probable Cause

20. Based on the above, on 05/24/2017, agents executed simultaneous search

warrants of the residences of Joseph Mark WILLIAMS, Jr., at 69980 County Road 362, Watervliet, MI (Van Buren County¹); and Sherri SMITH, at 54152 Ash Road Lot 332, Osceola, IN. The search warrant for the Watervliet residence was authorized by Magistrate Judge Phillip J. Green, and is 1:17-mj-00158.

21. During the searches, several items were seized that could be utilized in the production, storage, or transmission of child pornography. These items included, but were not limited to, laptops, cellular telephones, external hard drives, tablets, and thumb drives.
22. Other items seized were indicative of the sexual exploitation or abuse of children, or relevant to child pornography received through TFO Peachey's communications with WILLIAMS. These items included, but were not limited to, prepubescent girls' underwear, adult erotic paraphernalia, and household items that were observed in the background of child pornography sent to TFO Peachey.
23. Prior to the execution of the search warrant, call logs for WILLIAMS obtained by administrative subpoena were reviewed going back to early April 2017. Besides numerous calls with SMITH, several calls were made to two telephone numbers. Public records checks indicated that the numbers were subscribed to by a subject, S1,² who according to public records resided in Watervliet, MI.
24. Facebook searches for S1 returned images within her profile that showed S1's daughter, a pubescent female, herein referred to as **Victim 3**, or "**V3**." Contacts with Watervliet Public Schools via Watervliet PD confirmed that **V3** is a 14 year-old female. Due to the frequency of contact with S1's numbers, there was the possibility of evidence of a third victim that would be located at the search.
25. Two items of note seized from the residence of WILLIAMS were birth control pills prescribed to **V3**, dated 11/11/2015 and a handwritten "love poem," possibly written for WILLIAMS, authored by **V3**.
26. A third item, what appeared to be a molding of only the buttocks, vaginal region, and anus and intended for erotic use was also seized. Though this

¹ Watervliet, Michigan is in Berrien County; however the Williams residence is just over the county line in Van Buren County (despite the Watervliet address).

² The names of the subject and her daughter are known to law enforcement and are not included here to protect their identities.

type of item is regularly found in adult erotica stores, this particular version was the size of a toddler or pre-school-aged female.

27. FBI South Bend RA reviewed the electronic devices seized from the residence of Sherri SMITH and found no evidence of child pornography production or distribution. FBI South Bend RA collected several items from the scene that were in the background or observed in the photographs distributed by WILLIAMS to TFO Peachey. In particular, images of V1 undressing for the shower were confirmed to be the same bathroom as that observed at the residence of Sherri SMITH. Bathroom mats and items were collected as evidence in the production of these images.
28. FBI Saint Joseph RA has reviewed a substantial number of storage items from devices seized from Joseph Mark WILLIAMS, Jr.'s residence, and has located images confirming the production of child pornography. Based on the images and the appearances of the victims therein, the below photographs are believed to have been taken within the past year. A description of a few of the relevant images is as follows:
 - a. A nude adult male seated, pelvic area visible, and a naked, bi-racial toddler, facially identifiable as V2, is straddling the male's lap, reaching out with her hand to touch the male's erect penis.
 - b. The same positioning of the prior image, but in this image, the male is holding his erect penis up towards her mouth, and her mouth is around the tip. The side of V2's face and hair are visible in the image.
 - c. An image of a nude adult male in full, facially identifiable as WILLIAMS, is seated in a beige recliner, with V2 seated next to him, and his left arm is around her. V2 has something tucked under her arm and does not appear to be nude.
 - d. An image of V2 lying on her back, face visible. V2 appears to be nude. A black female physically and facially identifiable as Sherri SMITH is bent over and licking V2's stomach. An adult white male standing over the pair appears to be ejaculating on SMITH's back. His penis, pelvis, and hand are visible, and he appears to be taking the image from his perspective looking down on them.
 - e. An image of part of SMITH's face (her nose ring is in the image), sitting back with V2 reclined against her. SMITH is holding apart V2's legs, and a white male is holding his erect penis inches away from and aiming towards V2's genitals.
 - f. An image of WILLIAMS' face tucked into the genital area of what appears to be a toddler, seeming to kiss the child's genital

region. Child appears to be bi-racial and is wearing a pink Mickey Mouse top. The face and genitals of the child are not visible.

g. An image of WILLIAMS' face, this time in the genital region of a toddler-aged bi-racial female, licking her genitals. An opened diaper is visible laying under the child. The child is laying immediately adjacent to a rainbow, zebra-patterned bedspread that was observed in WILLIAMS' residence during the search warrant on 05/24/2017.

h. A naked, toddler-aged, bi-racial female kneeling on all fours with her buttocks in the air towards the camera and displaying her genitals. Her face is not visible. The child is on a dark brown couch observed in the residence of WILLIAMS during the search warrant.

i. A black nude female posed on all fours and physically identifiable as SMITH over V2. V2 is laying perpendicular to SMITH, and her legs are coming out from under the right side of SMITH, and her head and arms to the left. It is not apparent if V2 is nude. A white male is standing above them taking the picture downward from his perspective. The male's feet, penis, and left hand are visible. The male is holding his erect penis.

j. An image of V3, face visible, on her back on a rainbow, zebra-patterned bedspread that was observed in WILLIAMS' residence during the search warrant. V3 is wearing a black tank top and is assembling a purple vibrator. Her legs are bent and spread, and her black underwear is pulled aside to show her genitalia.

k. An image again of V3, shot lower on her body so cutting off her face, but same clothing and comforter. V3 is inserting a purple vibrator into her vagina. An identical vibrator was seized during the search of WILLIAMS' residence.

l. An image of V3's face in profile wearing a white, zebra-striped blindfold identical to one seized from the search of WILLIAMS' residence. V3 is performing oral sex on an adult white male. The photo was taken from the side at close range.

m. A full image of WILLIAMS lying on his back nude, with V1 lying next to him, clothed. V1's full body and face are visible and facially identifiable as V1. V1's legs are slung over WILLIAMS' left leg, and his left hand is laying across her legs. WILLIAMS is touching his erect penis with his other hand. V1 looks like she may be asleep in the image.

Conclusion

29. This affidavit is presented as probable cause that Joseph Mark WILLIAMS

and Sherri SMITH, sexually exploited minors (i.e., produced child pornography), in violation of Title 18, United States Code Section 2251(a).